

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 18-CR-129 (JPS)

IONEL MURESANU,

Defendant.

**MURESANU’S MOTION IN LIMINE REGARDING
IMMIGRATION STATUS OR HERITAGE**

Ionel Muresanu, by counsel, moves in limine to exclude the government from presenting evidence of Muresanu’s immigration status or heritage, including any reference to him as an illegal immigrant, Romanian, Romani, or the more pejorative Gypsy. Muresanu is a Romanian national who has petitioned the government for political asylum. He is charged with fraud and identity theft offenses, and his non-citizenship is wholly unrelated to the Indictment. Questions about whether he is legally or other evidence that he isn’t are therefore irrelevant under F.R.E. 401. Sadly, it’s also unfairly prejudicial under F.R.E. 403.¹

¹ See e.g. Paul Waldman and Greg Sargent, Trump and Stephen Miller are now targeting legal immigrants. This will get uglier., Washington Post (August 7, 2018), *available at* <https://www.washingtonpost.com/blogs/plum-line/wp/2018/08/07/trump-and-stephen-miller-are-now-targeting-legal-immigrants-and-it-will-get-uglier>; Erin Durkin, Laura Ingraham condemned after saying immigrants destroy ‘the America we love’, The Guardian (Aug. 9, 2018), *available at* <https://www.theguardian.com/media/2018/aug/09/laura-ingraham-fox-news-attacks-immigrants>.

Dated at Milwaukee, Wisconsin, this 10th of August, 2018.

Respectfully submitted,

/s/ Joshua Uller

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